

LIVE OAK LAW OFFICE LLP
Robyn Fass Wang (SBN 194006)
Pilar R. Stillwater (SBN 260467)
1442A Walnut Street #229
Berkeley, California 94709
Telephone: 510.637.9349
rfasswang@liveoaklawoffice.com
pstillwater@liveoaklawoffice.com
Attorneys for Plaintiffs:
*William Stephenson, Thomas Bodnar, and
Joshua Forster*

ROB BONTA, State Bar No. 202668
Attorney General of California
MAUREEN C. ONYEAGBAKO, State Bar No. 238419
BENJAMIN G. DIEHL, State Bar No. 192984
Supervising Deputy Attorneys General
GRANT LIEN, State Bar No. 187250
MICHAEL E. BYERTS, State Bar No. 218946
Deputy Attorneys General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6266
Fax: (213) 897-2805
E-mail: Michael.Byerts@doj.ca.gov
Attorneys for Defendants Clendenin and Price

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

**WILLIAM STEPHENSON, JOSHUA
FORSTER, AND THOMAS BODNAR,**

Plaintiffs,

v.

**STEPHANIE CLENDENIN AND
BRANDON PRICE,**

Defendants.

2:22-cv-1521-DAD-JDP

**STIPULATION AND [PROPOSED]
ORDER FOR AN EXTENSION OF TIME
FOR PLAINTIFFS' TO FILE
CONSOLIDATED COMPLAINT**

STIPULATION

Plaintiffs William Stephenson, Thomas Bodnar, and Joshua Forster (collectively, "Plaintiffs"), and Defendants Stephanie Clendenin and Brandon Price (collectively with Plaintiffs, the "Parties"); by and through their respective counsel, hereby stipulate and agree, and request that this Court order as follows:

WHEREAS, on November 1, 2024, the Court granted the Parties' request to consolidate Plaintiff's three individual cases (ECF No. 59);

1 WHEREAS, the Parties respectfully request that the Court grant a 30-day extension of time
2 in which to file their Consolidated Complaint, which is currently due on December 16, 2024, per
3 the Court's November 1, 2024, Order (ECF No. 59);

4 WHEREAS, Plaintiffs' counsel needs additional time to accommodate the difficulty of
5 exchanging draft documents with Plaintiffs, who can only receive draft documents in person or
6 via U.S. Postal Service;

7 WHEREAS, the Parties will also be meeting and conferring over the holiday season and
8 will therefore need additional time in which to meet and confer regarding the contents of
9 Plaintiff's proposed Consolidated Complaint; and

10 WHEREAS, this is the first extension of time sought by any Party since the Court
11 appointed counsel and consolidated Plaintiffs' individual cases (see ECF No. 59);

12 **IT IS HEREBY AGREED AND STIPULATED THAT:**

13 1. The Parties respectfully request that the Court grant a 30-day extension of time for
14 Plaintiffs to file their consolidated complaint, which is currently due on December 16, 2024, to
15 and including January 15, 2025.

16 2. Plaintiffs will prepare a consolidated complaint for Defendant's review and approval
17 to be filed by January 15, 2025. Should the parties be unable to reach agreement on the final
18 consolidated complaint after meeting and conferring the parties will seek additional guidance
19 from this Court.

20 3. Defendants have not yet filed a responsive pleading in *Bodnar v. Clendenin*, 2:22-cv-
21 01533-DAD-AC. Because Plaintiffs are preparing a consolidated complaint, the parties continue
22 to agree Defendants do not need to file a responsive pleading to the currently operative complaint
23 in that matter and will instead file a responsive pleading in response to the consolidated complaint
24 once it is filed and served.

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Respectfully submitted,
LIVE OAK LAW OFFICE LLP

Dated: December 13, 2024

/s/ Pilar R. Stillwater
Pilar R. Stillwater
Robyn Fass Wang
Attorneys for Plaintiffs:
William Stephenson, Thomas Bodnar, and Joshua Forster

Dated: December 13, 2024

Respectfully submitted,
ROB BONTA
Attorney General of California
BENJAMIN G. DIEHL
MAUREEN C. ONYEAGBAKO
Supervising Deputy Attorneys General

/s/ Grant Lien
GRANT LIEN
MICHAEL E. BYERTS
Deputy Attorneys General
Attorneys for Defendants Clendenin and Price

PROPOSED ORDER

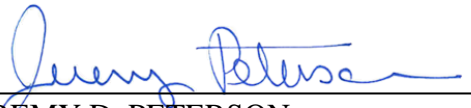
For good cause shown, the Court GRANTS the parties' stipulation, as follows:

1. Plaintiffs will prepare a consolidated complaint for Defendant's review and approval to be filed by January 15, 2025. Should the parties be unable to reach agreement on the final consolidated complaint after meeting and conferring the parties will seek additional guidance from this Court.

2. Defendants will not be required to file a pleading in response to the currently operative complaint in *Bodnar v. Clendenin*, Case No. 2:22-cv-1533-DAD-AC, and will instead file a responsive pleading to the consolidated complaint once approved for filing. If a consolidated complaint is not approved for filing, the parties will seek additional guidance from this Court regarding the filing of a responsive pleading to the currently operative complaint in the *Bodnar* case.

IT IS SO ORDERED.

Dated: December 16, 2024


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE